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Attorneys for Plaintiff/Counter-Defendant

CornerStone Staffing Solutions, Inc., and

Counter-Defendant Mary Anderson

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT - SAN FRANCISCO DIVISION

CORNERSTONE STAFFING  
SOLUTIONS, INC., a California  
corporation,

Plaintiff,

vs.

LARRY THAXTER JAMES, an  
individual; et al.,

Defendants.

AND RELATED COUNTER-  
CLAIMS.

CASE NO. 12-cv-01527-RS

[Assigned to Hon. Richard Seeborg]

**STIPULATION AND ~~[PROPOSED]~~  
ORDER EXTENDING TIME TO  
RESPOND TO MARCOS BARRERA  
SUMMARY JUDGMENT MOTION**

Date: October 3, 2013

Time: 1:30 p.m.

Location: Courtroom 3

Complaint Filed: March 27, 2012

Trial Date: February 10, 2014

**STIPULATION**

WHEREAS, on August 23, 2013, Defendant Marcos Barrera ("Barrera") filed a Motion for Summary Judgment or, in the Alternative, Partial Summary Judgment [dtk. # 186] (the "Barrera MSJ"), in the above-entitled matter;

WHEREAS, the current deadline for Plaintiff Cornerstone Staffing Solutions, Inc. ("Cornerstone") to file its opposition to the Barrera MSJ is September 6, 2013, and the

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current deadline for Barrera to file a reply brief is September 13, 2013;

WHEREAS, CornerStone's consultant has been unable to access the disk drive images provided by Barrera, the review of which is critical to CornerStone's opposition to the Barrera MSJ; and

WHEREAS, counsel for CornerStone and Barrera have agreed that an extension is necessary as to the deadline for CornerStone to file its opposition to the Barrera MSJ;


WHEREFORE, CornerStone and Barrera, by and through their counsel of record, enter into this Stipulation to modify the Barrera MSJ briefing schedule as follows:

1. The deadline for CornerStone to file its opposition to the Barrera MSJ is extended to September 20, 2013; CornerStone's counsel shall provide Barrera's attorneys of record with a courtesy electronic copy of the opposition upon filing; and

2. The deadline for Barrera to file its reply is extended to September 27, 2013.


DATED: August 28, 2013

**HILL, FARRER & BURRILL LLP**

By:   
NEIL D. MARTIN  
Attorneys for Plaintiff/Counter-Defendant  
CORNERSTONE STAFFING SOLUTIONS,  
INC. and Counter-Defendant MARY  
ANDERSON

DATED: August 28, 2013

**WOOD, SMITH, HENNING & BERMAN LLP**

By:   
SEYMOUR B. EVERETT  
STEVE R. DISHAROON  
Attorneys for Defendant  
MARCOS BARRERA

DATED: August , 2013

**BURKHARDT & LARSON**

By:  
PHILIP BURKHARDT  
Attorneys for Defendant  
MARCOS BARRERA

1 current deadline for Barrera to file a reply brief is September 13, 2013;

2 WHEREAS, CornerStone's consultant has been unable to access the disk drive  
3 images provided by Barrera, the review of which is critical to CornerStone's opposition to  
4 the Barrera MSJ; and

5 WHEREAS, counsel for CornerStone and Barrera have agreed that an extension is  
6 necessary as to the deadline for CornerStone to file its opposition to the Barrera MSJ;

7 WHEREFORE, CornerStone and Barrera, by and through their counsel of record,  
8 enter into this Stipulation to modify the Barrera MSJ briefing schedule as follows:

9 1. The deadline for CornerStone to file its opposition to the Barrera MSJ is  
10 extended to September 20, 2013; CornerStone's counsel shall provide Barrera's attorneys  
11 of record with a courtesy electronic copy of the opposition upon filing; and

12 2. The deadline for Barrera to file its reply is extended to September 27, 2013.

13 DATED: August 28, 2013

HILL, FARRER & BURRILL LLP

14 By: 

15 NEIL D. MARTIN  
16 Attorneys for Plaintiff/Counter-Defendant  
17 CORNERSTONE STAFFING SOLUTIONS,  
18 INC. and Counter-Defendant MARY  
ANDERSON

19 DATED: August , 2013

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20 By:

21 SEYMOUR B. EVERETT  
22 STEVE R. DISHAROON  
23 Attorneys for Defendant  
MARCOS BARRERA

24 DATED: August 28, 2013

BURKHARDT & LARSON

25 By: 

26 PHILIP BURKHARDT  
27 Attorneys for Defendant  
28 MARCOS BARRERA

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Based upon the above executed Stipulation extending the time for Plaintiff Cornerstone Staffing Solutions, Inc. ("Cornerstone") to respond to the Motion of Defendant Marcos Barrera ("Barrera") for Summary Judgment or, in the Alternative, Partial Summary Judgment [dtk. # 186] (the "Barrera MSJ"), in the above-entitled matter, and for good cause shown, **IT IS ORDERED** as follows:

1. The Stipulation of the parties is **APPROVED**;
2. The deadline for CornerStone to file its opposition to the Barrera MSJ is extended to September 20, 2013;
3. The deadline for Barrera to file any reply to CornerStone's opposition is extended to September 27, 2013;
4. Counsel for CornerStone and Barrera shall provide to all attorneys of record in this matter a courtesy electronic copy of the opposition and reply briefs, respectively, immediately upon the filing of the same.

**IT IS SO ORDERED.**

DATED: 8/29/13



HON. RICHARD SEEBORG  
UNITED STATES DISTRICT JUDGE

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